

To: Cleland-Hamnett, Wendy[Cleland-Hamnett.Wendy@epa.gov]
From: Morris, Jeff
Sent: Tue 2/4/2014 1:12:55 PM
Subject: RE: House Energy And Commerce Inquiry on WV chems

That's right: MCHM and PPH were on the original inventory. Only di-PPH, and a compound related to MCHM came in as PMNs. For your background, here's detail from Tracy Williamson:

Primary chemical

MCHM (CASRN 34885-03-5, "4-methylcyclohexanemethanol")

- Surfactant/frothing/foaming agent
- Put on original TSCA Inventory
- 1 public CDR report from Eastman Chemical (PV is CBI)

Other chemicals involved

-

MCHM-related - The composition in the MSDS for "crude MCHM" is below.

- All of these chemicals are on the TSCA Inventory (non-CBI).
- All were put on the original Inventory except the second listed component [CASRN 98955-27-2, "4-(methoxymethyl)cyclohexanemethanol].
- The second listed component [CASRN 98955-27-2, "4-(methoxymethyl)cyclohexanemethanol] came in as a PMN and has no regulatory flags associated with it. It is likely just a byproduct in crude MCHM, but it is very similar to MCHM and also functions as a frothing agent (which is likely why it came in at one point in a PMN).

2. COMPOSITION INFORMATION ON INGREDIENTS

(Typical composition is given, and it may vary. A certificate of analysis can be provided, if available.)

Weight %	Component	CAS Registry No.
68 - 89%	4-methylcyclohexanemethanol	34885-03-5
4 - 22%	4-(methoxymethyl)cyclohexanemethanol	98955-27-2
4 - 10%	water	7732-18-5
5%	methyl 4-methylcyclohexanecarboxylate	51181-40-9
1%	dimethyl 1,4-cyclohexanedicarboxylate	94-60-0
1%	methanol	67-56-1
1 - 2%	1,4-cyclohexanedimethanol	105-08-8

“Other” - There was a list of “other” chemicals that we were provided last week to take a look at. See information provided in the attached email thread.

Aromatic glycol ethers – Regarding Propylene glycol phenyl ether (CASRN 770-35-4, “2-Propanol, 1-phenoxy-”) and *di*-Propylene glycol phenyl ether [CASRN 51730-94-0, “Propanol, 1(or 2)-(methyl-2-phenoxyethoxy)-”] more recently reported in the press:

- These are also used as frothing agents in coal processing (washing).
- Both are on the TSCA Inventory (non-CBI).
- Propylene glycol phenyl ether (CASRN 770-35-4) was put on the original Inventory. There are 3 public CDR reports with a National PV of 208,306 lb/yr.
- *di*-Propylene glycol phenyl ether (CASRN 51730-94-0) came in as a PMN and has no regulatory flags associated with it. There are no public CDR reports.
- The relationship between propylene glycol phenyl ether (CASRN 770-35-4) and *di*-propylene glycol phenyl ether (CASRN 51730-94-0) is similar to the relationship between MCHM/4-methylcyclohexanemethanol (CASRN 34885-03-5) and 4-(methoxymethyl)cyclohexanemethanol (CASRN 98955-27-2), in terms of use, reporting under TSCA, etc.
- As a “full service producer” of chemicals for industries including coal, Freedom Industries must be producing both the cyclohexane-alcohol-type frothing agents (MCHM) and the aromatic-glycol-ether-type frothing agents if both were found in the spill.

From: Cleland-Hamnett, Wendy
Sent: Monday, February 03, 2014 5:28 PM
To: Morris, Jeff
Subject: FW: House Energy And Commerce Inquiry on WV chems

That's right, isn't it?

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From: Kaiser, Sven-Erik
Sent: Monday, February 03, 2014 5:17 PM
To: Fort, Felecia; Wallace, Ryan; Mojica, Andrea; Flattery, Priscilla; Cleland-Hamnett, Wendy; Grant, Brian
Subject: House Energy And Commerce Inquiry on WV chems

Jerry Couri of House Energy and Commerce (maj) asks whether PPH and MCHM were subject to TSCA section 5 review. Based on previous answers to other requesters, I believe they were both put on the original inventory so not subject to section 5 review. Please let me know if ok with that response. Thanks,

Sven

Sven-Erik Kaiser

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From: Couri, Jerry [<mailto:JerryCouri@mail.house.gov>]

Sent: Monday, February 03, 2014 11:56 AM

To: Kaiser, Sven-Erik

Subject: Have these been subject to Section 5 review?

PPH and MCHM